REMARKS

The above amendments and following remarks are submitted in response to the Official Action of the Examiner mailed July 7, 2005. Having addressed all objections and grounds of rejection, claims 1-25, being all the pending claims, are now deemed in condition for allowance. Reconsideration to that end is respectfully requested.

The Examiner has rejected claims 1-25 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,185,567, issued to Ratnaraj et al (hereinafter referred to as "Ratnaraj"). This ground of rejection is respectfully traversed for the reasons discussed in detail below.

The standards for a finding of anticipation during examination are specified in MPEP 2131, which provides in part:

> TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH
> EVERY ELEMENT OF THE CLAIM
> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."
> *Verdegaal Bros. v. Union Oil Co. of California,* 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). **"The identical invention must be shown in as complete detail as is contained in the ... claim.**" *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). (emphasis added)

The rejection is respectfully traversed because Ratnaraj does not describe "each and every element" set forth in the claim "in as complete detail as is contained in the claim" as required by MPEP 2131.

Quite apart from the many issues associated with whether or not Ratnaraj meets the environmental limitations of the claims, the prior art of record certainly does not meet the key limitations associated with the apparatus and method of storing intermediate computational data produced during the honoring of a service request. This feature is summarized at page 12, line 12, through page 13, line 2. Details of the preferred mode of practicing this feature is highlighted in Figs. 31-32, with corresponding description at page 51 of Applicants' specification.

Ratnaraj does not have this structure nor provide this functionality because it does not have the claimed "service request" which require that such computations be performed. Fig. 1 of Ratnaraj clearly shows that local user 38 and remote client terminal 40 are permitted access to integrated WRDS database 34 via retrieval algorithm 36. The data is previously prepared by conversion algorithm 32 in a manner which is asynchronous to any particular user request. As such, users are simply permitted to retrieve data from the data base. There is no suggestion that there is any computation performed in response to any user access requests or that such users are permitted to modify the contents of integrated WRDS database 34. Therefore, there is simply no "temporary computational data" generated in response to a user terminal "service request" for which storage would be useful.

To assist the Examiner in more readily appreciating this distinction, independent claims 1, 6, and 16 have been amended to make this feature even more explicit. Independent claims 11 and 21 are deemed to be sufficiently explicit in this regard as originally presented.

Specifically, with regard to the rejection of claim 1, the Examiner states, "Ratnaraj teaches....said legacy data base management system....", citing Figs. 1 and 3, items 10, 38, and 40, along with column 4, lines 1-67. Ratnaraj does not disclose the claimed "legacy data base management system", because any data base management disclosed is indicated to be novel by Ratnaraj (see column 4, lines 8-10). As explained above, the "service request" limitation of claim 1 has been amended to more explicitly require structure and functionality not found in Ratnaraj.

The final element of claim 1 is the "facility" which stores the intermediate "temporary computational data" for later use. As explained above, Ratnaraj has no such computations and therefore has no such "temporary computational data". In rejecting claim 1, the Examiner cites operation of conversion algorithm 32 (see Figs. 1 and 2) which, as explained above, prepares the contents of integrated WRDS database 34, but this preparation is not in response to the claimed "service request".

The rejection of amended claim 1, and all claims depending therefrom, is respectfully traversed for failure of the Examiner to meet any of the requirements of MPEP 2131 to establish anticipation.

Claim 2 depends from claim 1 and further limits the "facility" element. Having not found this element in rejecting claim 1, the Examiner cites a great deal of Ratnaraj text which does not meet the limitation of claim 2. The rejection of claim 2, and claims depending therefrom, is respectfully traversed.

Claim 3, as amended, further limits the "service request" to "executable text lines". Because no executable text lines are disclosed in Ratnaraj, the Examiner confusingly cites material associated with data conversion. The rejection of claim 3, and claims depending therefrom, is respectfully traversed.

Claim 4 depends from claim 3 further limits the claimed "service request" by user completion of a "screen" presented by the claimed "legacy data base management system". In rejecting claim 4, the Examiner cites column 5, lines 40-55, which mentions display to the user of requested data. However, it says nothing of the claimed "screen" completion to define the claimed "service request". The rejection of claim 4 is respectfully traversed.

Claim 5 depends from claim 4 and further limits the "screen" of claim 4. The Examiner again cites column 5, lines 1-10, which is inappropriate, because it says nothing of the claimed "screen"

to be completed by the user to define the claimed "service request". The rejection of claim 5 is respectfully traversed.

In the rejection of claim 6, the Examiner repeats the above clearly erroneous findings of fact and adds some additional ones. For example, the issue regarding the incompatibility between the claimed "service request" and the internal format of the claimed "legacy data base management system" is equated by the Examiner to receipt of incompatible "raw data". The Examiner states:

> ....raw data having a variety of data formats from a plurality of data sources having data formats such as ASCII, plain text or binary format being different from XML format....

This statement is legally irrelevant, because it does not address Applicants' claimed invention.

As with the rejection of claim 1, the Examiner again clearly erroneously finds the claimed "facility" to be the conversion of "raw data", which has nothing to do with a response to the claimed "service request". The rejection of amended claim 6, and all claims depending therefrom, is respectfully traversed.

Claim 7 depends from claim 6 and further limits the "publically accessible digital data network". As explained above, Ratnaraj does not have the elements of claim 6 from which claim 7 depends. Therefore, Ratnaraj cannot have the further limitations of claim 7. The rejection of claim 7, and claims depending therefrom, is respectfully traversed.

Claim 8 depends from claim 7 and is further limited by a "repository" within the "legacy data base management system". As explained above, Ratnaraj does not have the elements of claim 7 from which claim 8 depends. Therefore, Ratnaraj cannot have the further limitations of claim 8. The rejection of claim 8, and claims depending therefrom, is respectfully traversed.

Claims 9 and 10 further limit the "future use" of the stored information. As explained above, Ratnaraj has no such functionality. The rejection of claims 9 and 10 are respectfully traversed.

In his rejection of claim 11, the Examiner repeats many of the errors of his rejections of claims 1-10, and adds additional errors. For example, the "converting" step of claim element b converts the service request after its transfer to the claimed "legacy data base management system". In his clearly erroneous finding of this element within Ratnaraj, the Examiner cites Fig. 2 and column 9, lines 25-35, which involves conversion of data. There is no showing that Ratnaraj converts a "service request" or indeed has any need to do so.

With regard to the "commencing" step, the Examiner cites column 5, lines 1-5, which is concerned with building and maintaining integrated data base 34. This has nothing to do with the claimed honoring of the claimed "service request". As a result, there are certainly is no "interim computational state"

generating by the "commencing" step to be stored by the "storing" step. The rejection of claim 11, and all claims depending therefrom, is respectfully traversed.

Claim 12 depends from claim 11 and further limits the "storing" step. As explained above, Ratnaraj does not have the claimed "storing" step. Therefore, Ratnaraj cannot have these further limitations to the "storing" step. The rejection of claim 12 is respectfully traversed.

Claim 13 depends from claim 12 and further limits the "storing" step to initiation from a "screen" on the claimed "user terminal". As anyone of skill in the art would admit, Ratnaraj does not disclose this limitation. Therefore, the Examiner cites column 5, lines 50-58, in full awareness that this text is legally irrelevant, because it is directed to display of the access result. The citation says nothing of the claimed initiation of the "storing" step by the user terminal. The rejection of claim 13 is respectfully traversed.

Claim 14 depends from claim 13 and further limits the "screen" claimed in claim 13. Again, the Examiner cites legally irrelevant material from Ratnaraj which has nothing to do with the claimed invention. The rejection of claim 14 is respectfully traversed.

Claim 15 depends from claim 14 and further limits the claimed network. Ratnaraj does not have the limitations of claim

14, as explained above. Therefore, Ratnaraj cannot have the further limitations of claim 15. The rejection of claim 15 is respectfully traversed.

The rejection of claim 16 repeats many of the clearly erroneous findings of fact and incorrect applications of controlling law utilized in rejecting claim 6. As explained above, claims 6 and 16 have been amended to more explicitly require that the "storing means" store the "temporary computational data" produced by the "providing means" during honoring of the claimed "service request". Again, as explained above Ratnaraj does not have this structure, which is certainly not disclosed at Fig. 1, item 34, as alleged by the Examiner at the bottom of page 7 of the pending official action. The rejection of amended claim 16, and all claims depending therefrom, is respectfully traversed.

Claim 17 depends from claim 16 and further limits the claimed "storing means". For the reasons provided above, Ratnaraj does not have the claimed "storing means". As a result, Ratnaraj cannot have these further limitations to the "storing means". The rejection of claim 17 is respectfully traversed.

Claim 18 depends from claim 17 and further limits the "converting means" which converts the format of the service request. In rejecting claim 18, the Examiner states:

> ....converting into a common data format and is stored
> in an integrated database....

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Thus, the Examiner's rejection of claim 18 is legally irrelevant, because it does not address Applicants' claimed invention, which converts the claimed "service request". Ratnaraj simply converts the data for the data base as admitted by the Examiner. The rejection of claim 18 is respectfully traversed.

Claim 19 depends from claim 18 and further limits the claimed "transmitting means". Ratnaraj does not meet the limitations of claims 18 as explained above. Therefore, Ratnaraj cannot meet the limitations of claim 19 which depends therefrom. The rejection of claim 19 is respectfully traversed.

Claim 20 depends from claim 19 and further limits the claimed "storing means". For the reasons provided above, Ratnaraj does not have the claimed "storing means". As a result, Ratnaraj cannot have these further limitations to the "storing means". The rejection of claim 20 is respectfully traversed.

Claim 21 is an independent apparatus claim having five key elements. In rejecting claim 21 the Examiner makes numerous clearly erroneous findings of fact discussed above. In addition, the Examiner confuses conversion of the claimed "service request" with Ratnaraj's conversion of data to build integrated WRDS database 34. In accordance with this confusion, the Examiner continues to blur the distinction between processing of the claimed "service request" with Ratnaraj's processing of data.

The rejection of claim 21, and all claims depending therefrom is respectfully traversed.

Claim 22 depends from claim 21 and further limits the claimed "facility" which stores the claimed "computational state" of the claimed "legacy data base management system". Again the Examiner confuses this with Ratnaraj's conversion and storage of "raw data". The rejection of claim 22 is respectfully traversed.

Claim 23 depends from claim 22 and further limits the claimed network. Ratnaraj does not meet the limitations of claim 22 for the reasons provided above. Therefore, Ratnaraj cannot meet the further limitations of claim 23. The rejection of claim 23 is respectfully traversed.

Claim 24 depends from claim 23 and further limits the claimed "future use" of the stored "computational state". Ratnaraj does not meet the limitations of claim 23 for the reasons provided above. Therefore, Ratnaraj cannot meet the further limitations of claim 24. The rejection of claim 24 is respectfully traversed.

Claim 25 depends from claim 24 and further limits the claimed "future use" of the stored "computational state". Ratnaraj does not meet the limitations of claim 24 for the reasons provided above. Therefore, Ratnaraj cannot meet the further limitations of claim 25. The rejection of claim 25 is respectfully traversed.
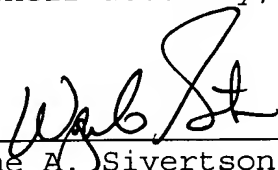
Having thus responded to each objection and ground of rejection, Applicants respectfully request entry of this amendment and allowance of claims 1-25, being the only pending claims.

Respectfully submitted,

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By their attorney,

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